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6 Plaintiff in Pro Per

7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9 LECIA L. SHORTER,  
10 Plaintiff,

11 vs.

12 LEROY BACA, GLORIA MOLINA, MARK  
13 RIDLEY-THOMAS, ZEV YAROSLAVSKY,  
14 DON KNABE, MICHAEL D.  
15 ANTONOVICH, DEPUTY SHERIFF  
16 AVALOS, DEPUTY SHERIFF ORTIZ, the  
17 COUNTY OF LOS ANGELES and, Does 1  
18 through 25, inclusive,  
19 Defendants.

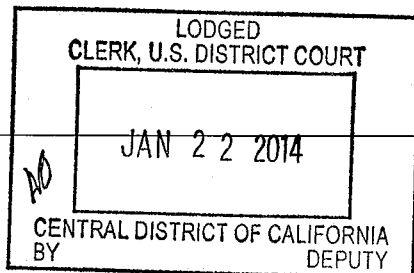
Case No.: CV-07337-JVS-(AGR)

[PROPOSED]

**SECOND AMENDED COMPLAINT FOR:**

- 1) **CIVIL RIGHTS VIOLATIONS, 42 U.S.C §1983 (General Allegations);**
- 2) **CIVIL RIGHTS VIOLATIONS, 42 U.S.C §1983 (Failure to Implement Appropriate Policies, Customs and Practices);**
- 3) **CIVIL RIGHTS VIOLATIONS, 42 U.S.C §1983 (Failure to Implement Appropriate Policies, Customs and Practices);**
- 4) **CIVIL RIGHTS VIOLATIONS, 42 U.S.C §1983 (Cruel and Unusual Punishment);**
- 5) **CIVIL RIGHTS VIOLATIONS, 42 U.S.C §1983 (Right to a Speedy Trial and Freedom of Association);**
- 6) **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS;**
- 7) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;**
- 8) **DEFAMATION;**
- 9) **ASSAULT AND BATTERY;**
- 10) **NEGLIGENT HIRING AND SUPERVISION; and,**
- 11) **NEGLIGENCE**

**DEMAND FOR JURY TRIAL**



1 PLAINTIFF LECIA L. SHORTER ALLEGES AS FOLLOWS:

2  
3 1. Plaintiff, LECIA L. SHORTER, is a citizen of the United States, and is now, and  
4 at all times mentioned herein was, a resident of the County of Los Angeles, State of California.

5 At all times mentioned in this Complaint was a prisoner in the custody of the Los Angeles  
6 County Sheriff's Department at the Century Regional Detention Facility, in Lynwood,  
7 California.

8  
9 2. This is an action brought pursuant to the First, Sixth, Eighth and Fourteenth  
10 Amendments to the Constitution of the United States and to 42 U.S.C. §1983. The jurisdiction of  
11 this Court is predicated on 28 U.S.C. §§ 1331 and 1343(a).

12 3. A substantial portion of the events giving rise to this action occurred in Lynwood,  
13 California located in Los Angeles County. Venue is therefore proper under 28 U.S.C. § 1391(b).

14  
15 4. Each named Defendant was, at all times mentioned in this complaint, acting under  
16 color of statutes, ordinances, regulations, customs, or usage, of the State of California. This  
17 action is brought against Defendants for violation of Plaintiff's a) right to be free of cruel and  
18 unusual punishment, guaranteed by the *Eighth* and *Fourteenth Amendments to the United States*  
19 *Constitution*; b) Sixth Amendment right to a speedy trial; c) Sixth Amendment right to be  
20 represented by counsel for her defense; d) First Amendment right to freedom of association with  
21 her attorney; and, e) right to be free from excessive bail.

22  
23 5. Defendant LEROY BACA, is and at all times mentioned in this complaint was,  
24 acting in the course and scope of his employment as the Sheriff of Los Angeles County. As  
25 Sheriff, he is the chief executive officer of the Los Angeles Sheriff Department. According to  
26 California law, the Sheriff is answerable for the safekeeping of the inmates in his custody.  
27 California Government Code §§26605 and 26610; California Penal Code §4006. Specifically,  
28

1 Defendant BACA is responsible for the oversight, management and administration of policies of  
2 the County of Los Angeles with reference to local jails, including but not limited to housing  
3 practices, transportation, and, medical and dental services. This includes all matters relating to  
4 the selection, supervision, promotion, training, and discipline of the uniformed staff, including  
5 the supervisory security and medical staffs, of the County Jails. He is also responsible for the  
6 care, custody, and control of all inmates housed in the County Jails.  
7

8 6. Plaintiff is informed and believes and thereon alleges that Defendant Baca is  
9 regularly provided with reports of applications of force, substandard medical care, improper strip  
10 searches, allegations of unreported and excessive use of force and breaches of security in the  
11 County Jails. Plaintiff sues Defendant BACA in his official and individual capacity.  
12

13 7. Defendant Gloria Molina is the Supervisor of the First District of Los Angeles  
14 County. The Board of Supervisors is the governing body of the County of Los Angeles, a  
15 charter county. As such, it has the function of serving as the executive and legislative head of the  
16 Los Angeles County. Defendant Molina is sued in her official capacity regarding her  
17 administrative and executive acts while serving as a member of the Board of Supervisors for Los  
18 Angeles County.  
19

20 8. Defendant Mark Ridley-Thomas is the Supervisor of the Second District of Los  
21 Angeles County. The Board of Supervisors is the governing body of the County of Los Angeles,  
22 a charter county. As such, it has the function of serving as the executive and legislative head of  
23 the Los Angeles County. Defendant Ridley-Thomas is sued in his official capacity regarding his  
24 administrative and executive acts while serving as a member of the Board of Supervisors for Los  
25 Angeles County.  
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1           9. Defendant Zev Yaroslavsky is the Supervisor of the Third District of Los Angeles  
2 County. The Board of Supervisors is the governing body of the County of Los Angeles, a  
3 charter county. As such, it has the function of serving as the executive and legislative head of the  
4 Los Angeles County. Defendant Yaroslavsk is sued in his official capacity regarding his  
5 administrative and executive acts while serving as a member of the Board of Supervisors for Los  
6 Angeles County.  
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8           10. Defendant Don Knabe is the Supervisor of the Fourth District of Los Angeles  
9 County. The Board of Supervisors is the governing body of the County of Los Angeles, a  
10 charter county. As such, it has the function of serving as the executive and legislative head of the  
11 Los Angeles County. Defendant Knabe is sued in his official capacity regarding his  
12 administrative and executive acts while serving as a member of the Board of Supervisors for Los  
13 Angeles County.  
14

15           11. Defendant Michael D. Antonovich is the Supervisor the Fifth District of Los  
16 Angeles County. The Board of Supervisors is the governing body of the County of Los Angeles,  
17 a charter county. As such, it has the function of serving as the executive and legislative head of  
18 the Los Angeles County. Defendant Antonovich is sued in his official capacity regarding his  
19 administrative and executive acts while serving as a member of the Board of Supervisors for Los  
20 Angeles County.  
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22           12. Defendants, and each of them, are aware of the culture of deputy violence,  
23 intimidation, retaliation, substandard medical care, improper body searches, and inappropriate  
24 conduct that pervades the Los Angeles County Jails and have failed to take reasonable measures  
25 to remedy the problems. Plaintiff therefore charges Defendants Baca, Molina, Ridley-Thomas,  
26 Yaroslavsky, Knabe and Antonovich with violations of Plaintiffs' First, Sixth, Eighth, Eleventh  
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1 and Fourteenth Amendment right to reasonable protection from violence and excessive force,  
2 substandard medical and dental care, interference with her right to associate with her attorney,  
3 and, interference with her right to a speedy trial.

4 13. Plaintiff is informed and believes and thereon alleges that Defendants, and each of  
5 them, have acquiesced in, fostered, and implicitly authorized the abuse incurred by Plaintiff by  
6 failing to adequately train and supervise deputies and the medical staff in the face of historical  
7 and continual evidence of abuse. Defendants have failed to conduct meaningful investigations of  
8 reports of excessive force, improper strip searches, sub-standard medical and dental care, render  
9 guilty deputies accountable, and repeatedly ignored evidence that deputies and other Los  
10 Angeles County officials are covering up incidents of excessive force, inmate torture,  
11 substandard medical care, improper strip searches and overall prisoner abuse.

12 14. On or about May 4, 2010, Plaintiff filed a complaint and claim for damages with  
13 Los Angeles County Sheriff's Department concerning the use of excessive force by Los Angeles  
14 County Sheriff Deputies Ian Beckford and R. Williams on April 9, 2010. Specifically, Plaintiff  
15 was physically assaulted by Deputy Ian Beckford when making an inquiry about a court  
16 appearance at the Los Angeles Superior Court at LAX on April 9, 2010. Deputy Beckford called  
17 for assistance and Deputy Williams and another unidentified deputy joined in the attack, forcing  
18 Plaintiff to the floor and putting their knees on Plaintiff's back with force.

19 15. Notwithstanding his responsibilities as chief executive officer of the Los Angeles  
20 Sheriff Department and notice of the allegations, Defendant LEROY BACA did not personally  
21 investigate the allegations of misconduct concerning Deputies Beckford, Williams and the  
22 unidentified deputy involved in the incident of April 9, 2010.

1           16.     On or about August 24, 2010, the Los Angeles County Board of Supervisors  
2 denied Plaintiff's claim for damages without making an inquiry to Defendant LEROY BACA or  
3 conducting an investigation of the misconduct of Deputies Beckford and Williams. The Los  
4 Angeles County Supervisors who failed to investigate Plaintiff's complaint were Defendants  
5 GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE and  
6 MICHAEL D. ANTONOVICH.  
7

8           17.     On or about January 21, 2011, Plaintiff filed a complaint and claim for damages  
9 with the Los Angeles County Sheriff's Department concerning a series of incidents that occurred  
10 during her incarceration from October 19, 2010 through November 24, 2010. Specifically, on  
11 October 17, 2010, Plaintiff was arrested by the Beverly Hills Police Department after having  
12 been accused of trespassing at her private mail box location. Plaintiff was held on \$30,000.00  
13 bail and transported to the Century Regional Detention Facility in Lynwood, California, operated  
14 by the Los Angeles County Sheriff's Department.  
15

16           18.     While at the Century Regional Detention Facility from October 19 through  
17 November 24, 2010, Plaintiff experienced the following: a) placement in a cell for two days  
18 with an inoperable toilet that was filled with urine, no ventilation, no water, an inoperable sink,  
19 an inoperable toilet, no blanket, no mattress padding on the steel bunk; b) denied showers; c)  
20 deputies' refusal to provide immediate medical attention to address Plaintiff's serious medical  
21 condition; d) being kicked and slapped after fainting; e) substandard medical care; f) deputy  
22 interference with medical decisions after being hospitalized; g) being forced to have a medical  
23 procedure; h) refusals of request to speak with her attorney and/or a family member after being  
24 hospitalized; i) deputy physical and mental abuse while Plaintiff was hospitalized; and, not being  
25 allowed confidential communications with health care providers while hospitalized.  
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1           19.     Notwithstanding his responsibilities as chief executive officer of the Los Angeles  
2 Sheriff Department and notice of the allegations, Defendant LEROY BACA did not personally  
3 investigate the allegations of misconduct concerning Plaintiff's incarceration from October 19,  
4 2010 through November 24, 2010.

5           20.     On or about March 15, 2011, the Los Angeles County Board of Supervisors  
6 denied Plaintiff's claim for damages without making an inquiry to Defendant LEROY BACA or  
7 investigating Plaintiff's allegations.  
8

9           21.     The Los Angeles County Supervisors failed to make an inquiry of Defendant  
10 BACA concerning Plaintiff's incarceration from October 19 to November 24, 2010 were  
11 Defendants GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON  
12 KNABE and MICHAEL D. ANTONOVICH.  
13

14           22.     On or about January 18, 2012, Plaintiff filed a complaint and claim for damages  
15 directly with the County of Los Angeles concerning various incidents that occurred during her  
16 incarceration at the Century Regional Detention Center from November 15, 2011 through  
17 December 17, 2011. Plaintiff also sent a complaint to Defendant LEROY BACA about the  
18 incident that occurred during the same period of incarceration.  
19

20           23.     Plaintiff exhausted all available administrative remedies, by filing a claim with  
21 Los Angeles County on January 18, 2012. Plaintiff also wrote Defendant LEROY BACA  
22 personally to apprise him of the incidents at Century Regional Detention Facility. Defendant  
23 LEROY BACA wrote Plaintiff and told her she had received dental care. On February 28, 2012,  
24 Plaintiff's claim for damages was denied by Defendant LOS ANGELES COUNTY BOARD OF  
25 SUPERVISORS.  
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24. In April of 2013, Plaintiff filed a complaint and claim for damages with Defendants Baca and Los Angeles County concerning a series of incidents that occurred during her arrest and incarceration in January of 2013. Specifically, on January 9, 2013, Plaintiff was arrested by the Los Angeles County Sheriff Department while travelling east on the Culver City Expo Train after being approached by Los Angeles County Sheriff Security Assistant Wahlquist (Badge Number 600280) and asked for proof payment of my fare for the Metro Train. Plaintiff mistakenly handed Security Assistant Wahlquist her mother's TAP pass instead of her TAP pass. Plaintiff carried her mother's TAP pass because she is a stroke survivor and often forgets where she places the card. Security Assistant Wahlquist decided that the photograph on the TAP pass did not match Plaintiff's appearance. Without asking any questions, Security Assistant Wahlquist walked away and returned with Los Angeles County Sheriff Deputy Shane Parks (Badge Number 455174). Deputy Parks asked that Plaintiff exit the train and travel to the Culver City Expo train station. Plaintiff and Deputy Parks exited the train at the Farmdale Station. Plaintiff refused to travel to Culver City. Deputy Shane Parks and Security Assistant Wahlquist became imperious and verbally abusive. Deputy Shane Parks forcefully grabbed Plaintiff, turned her around and handcuffed her. He then called for assistance. While waiting for other officers to arrive, Deputy Shane Parks stood behind Plaintiff, with one hand on her waist and the other on the hand cuffs. He repeated touched Plaintiff's buttocks and Plaintiff asked him to stop. He then started twisting Plaintiff's hands against the handcuffs. Plaintiff again asked him to stop because he was hurting her and he refused. Plaintiff then spit on the ground and told Deputy Shane Parks and Security Assistant Wahlquist "[t]his is what I think of you." Deputy Shane Parks then asked Security Assistant Wahlquist whether the spit hit her and she said no. He then asked Security Assistant Wahlquist whether she was certain the spit did not hit her and



1 she responded, "Yes, I think I felt some of it." Deputy Shane Parks then retorted "[g]reat! You  
2 now have a felony charge for spitting on an officer."

3 25. Deputy Parks continued to twist Plaintiff's wrists against the handcuffs until he  
4 caused visibly red marks and scars. When additional officers arrived, Deputy Parks shouted "we  
5 have a spitter." A female officer then went to her vehicle to retrieve a spitting mask which she  
6 placed on Plaintiff's head.  
7

8 26. Plaintiff arrived at Century Regional Detention Facility for booking at  
9 approximately 9:00 p.m. Deputy Parks then announced "she spit on a deputy." Numerous  
10 deputies then surrounded Plaintiff and took her to a holding cell. While inside the holding cell,  
11 two female officers, one them being Deputy Nalls, began to search Plaintiff. After searching  
12 Plaintiff, the deputies decided to remove Plaintiff's bra. The deputies then lifted Plaintiff's shirt  
13 and exposed her breasts in the presence of male officers. Plaintiff asked Deputy Nalls to not  
14 expose her breasts in the presence of male officers and Deputy Nalls stated, "don't worry, they  
15 can't see anything." However, the male officers were unquestionably positioned so that  
16 Plaintiff's breasts were in their plain view.  
17  
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19 27. Plaintiff was left inside of the holding cell, handcuffed with her hands behind her  
20 back and the spitting mask on her head for approximately twelve (12) hours. Plaintiff did not  
21 receive water, food or a blanket during that time. Plaintiff was not booked until approximately  
22 9:00 a.m. the next day. That is when she received food and a blanket and was able to retrieve  
23 water and utilize the toilet. Plaintiff was charged with two misdemeanors and an infraction and  
24 held on a \$25,000 bail.  
25

26 28. On January 25, 2013, Plaintiff was transported to the criminal courts building for  
27 a scheduled court appearance in Division 40. Her attorney, Joseph McInnis, requested an  
28

1 attorney consultation and was refused by Los Angeles County Sheriff Deputies. He was told that  
2 Plaintiff was a "miss out." The truth is that Plaintiff was not a "miss out" and was being held  
3 inside of holding cell number two at the Criminal Courts Building from approximately 6:30 a.m.  
4 to 6:30 p.m. Plaintiff was chained and handcuffed with three other women who had obvious  
5 mental health issues such that they removed their clothing and engaged in sex acts. During that  
6 time, Plaintiff could not utilize the toilet or eat. When Plaintiff asked sheriff deputies about the  
7 status of her case, Plaintiff was told the court had not called her case for hearing. Attorney  
8 Joseph McInnis informed Plaintiff that the court did in fact call her matter for hearing and the  
9 court was informed by sheriff deputies that Plaintiff was a "miss out." Los Angeles County  
10 Sheriff Deputies misrepresented this fact knowing that Plaintiff was being held inside of holding  
11 cell number two because inmates are electronically monitored from the time they leave CRDF to  
12 the time they return to CRDF. Additionally, there is a sign in sheet outside of the holding cell  
13 that deputies sign attesting they have checked on the status of the inmates inside of the holding  
14 cell. As a result of the misrepresentation that Plaintiff was a "miss out," Plaintiff's case was  
15 continued to January 29, 2013 and she lost four (4) days of her right to a speedy trial.  
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19 29. Notwithstanding his responsibilities as chief executive officer of the Los Angeles  
20 Sheriff Department and notice of the allegations, Defendant LEROY BACA did not personally  
21 investigate the allegations of misconduct concerning Plaintiff's arrest and incarceration in  
22 January of 2013.  
23

24 30. Defendant Los Angeles County denied Plaintiff's claim for damages without  
25 making an inquiry to Defendant LEROY BACA or investigating Plaintiff's allegations. Plaintiff  
26 exhausted all available administrative remedies, by filing a claim with Los Angeles County in  
27 April of 2013.  
28

**FIRST COUNT**  
**FOR VIOLATION OF CIVIL RIGHTS PURSUANT TO 42 U.S.C §1983**  
**AGAINST ALL DEFENDANTS**  
**(GENERAL ALLEGATIONS)**

31. Plaintiff incorporates herein paragraphs 1 through 30 as though fully set forth below.

32. In committing the acts complained of herein, Defendants, and each of them, acted under color of state law to deprive Plaintiff of certain constitutionally protected rights under the First, Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the Constitution of the United States including, but not limited to: a) the right to be free from cruel and unusual punishment; b) the right to freedom of association with her attorney; c) the right to a speedy trial; d) the right to be free from excessive use of force by persons acting under color of state law; and, e) the right to be free from excessive bail; f) the right to be free from sexual abuse and harassment; g) the right to complain via internal grievance procedures about jail conditions; h) the right of access to the courts to air grievances and complaints; i) the right to adequate medical and dental care and attention to treat both short-term conditions and long-term illnesses; and, j) to be free from unauthorized and intentional deprivation of her personal property by prison officials.

33. In violating Plaintiffs' rights as set forth herein and other rights that will be proven at trial, Defendants acted under color of state law while Plaintiff was a pre-trial detainee at the Century Regional Detention Facility (CRDF) in Lynwood, California from November 15, 2011 through December 17, 2011. While incarcerated at CRDF, Plaintiff experienced the following: a) the denial of adequate medical care and attention for the treatment of short-term conditions and a long-term illness; b) the refusal of jail employees to adhere to court medical orders; c) shower deprivations; d) deprivation of clean clothes and toiletries; e) the denial of

1 medication for a life threatening medical condition; f) refusals of attorney communications  
2 notwithstanding requests by her attorney; g) sexual harassment in the form of repetitive  
3 insistence by Los Angeles County Sheriff Deputies Avalos and Ortiz that Plaintiff manipulate  
4 her vagina; h) being chained and handcuffed to the door of her cell by Los Angeles County  
5 Sheriff Deputies Avalos and Ortiz without clothes on numerous occasions for up to six hours at a  
6 time; i) intentional food and medicine deprivation by Los Angeles County Sheriff Deputies  
7 Avalos and Ortiz; j) intentional and unauthorized deprivation of personal property by Los  
8 Angeles County Sheriff Deputies Avalos and Ortiz; k) being kept inside of a holding cell for ten  
9  
10 to twelve hours at the Criminal Courts Building while simultaneously not being allowed to  
11 appear in court despite attorney and court requests; l) being kept inside of a holding cell for ten  
12 to twelve hours at the Criminal Court Building with both hands chained to her waist making it  
13 virtually impossible for her to utilize the toilet or eat because she could not use her hands; m)  
14 being held in a cell 24 hours a day without physical activity or mental stimulation; n) deprivation  
15 of dental care for an infected tooth; o) being forced to stay in an unsanitary cell 24 hours a day  
16 which was never cleaned during her entire incarceration; p) being deprived access to file a  
17 grievance or complaint regarding the jail conditions at CRDF; and, q) being forced to stay in a  
18 cell that was extremely cold without adequate blankets or clothing.  
19  
20

21 34. Defendants also violated Plaintiff's civil rights and acted under color of state law  
22 when Plaintiff was arrested on January 9, 2013 and was a pre-trial detainee at the Century  
23 Regional Detention Facility (CRDF) in Lynwood, California from January 9, 2013 until January  
24 27, 2013. During the arrest, Plaintiff was physically assaulted and touched inappropriately by  
25 male sheriff deputy Shane Parks. During her detention at CRDF, Plaintiff's breasts were  
26 intentionally exposed to male deputies and she was held inside of a holding cell for twelve (12)  
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1 hours handcuffed, with a spitting mask on her head. Plaintiff was also wrongfully classified as a  
2 mental health patient and forced to remain in a holding cell at the criminal courts building for  
3 twelve (12) hours with inmates who removed their clothing, exposed their genitals and  
4 manipulated themselves sexually and denied access to the court.

5 35. The cruel and unusual punishment, deprivation of access to her attorney,  
6 interference with her right to a speedy trial, sexual abuse and harassment, and the use of  
7 excessive force by Defendants, were all in violation of Plaintiffs' rights under the First, Sixth,  
8 Eighth, and Fourteenth Amendments to the Constitution of the United States.  
9

10 36. As a direct and proximate result of the violation of their constitutional rights by  
11 the Defendants, Plaintiffs suffered general and special damages as alleged in this Complaint and  
12 are entitled to relief under 42 U.S.C §1983.  
13

14 37. The conduct of Defendants was willful, malicious, oppressive and/or reckless, and  
15 was of such a nature that punitive damages should be imposed in an amount commensurate with  
16 the wrongful acts alleged herein.  
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18  
19 **SECOND COUNT**  
20 **FOR VIOLATION OF CIVIL RIGHTS PURSUANT TO 42 U.S.C §1983**  
21 **AGAINST DEFENDANTS LEROY BACA AND THE COUNTY OF LOS**  
22 **ANGELES**  
23 **(Failure to Implement Appropriate Policies, Customs and Practices)**

24 38. Plaintiff incorporates herein paragraphs 1 through 37 as though fully set forth  
25 below.

26 39. At all times that Plaintiff was a pre-trial detainee, Defendant Leroy Baca was  
27 directly responsible for the oversight, management and administration of policies of the County  
28 of Los Angeles with reference to Los Angeles County jails, including but not limited to housing

1 practices, transportation, and, medical and dental services. Defendant Baca implicitly and tacitly  
2 authorized the actions and practices of jail employees and deputy sheriff's experienced by  
3 Plaintiff during her pre-trial incarceration.

4 40. Defendant Leroy Baca, in his capacity as Sheriff of the County of Los Angeles  
5 and the Defendant, County of Los Angeles, implicitly or explicitly adopted and implemented  
6 careless and reckless policies, customs, or practices, that included, among other things, of  
7 allowing employees of the Century Regional Detention Facility to treat inmates detained at  
8 CRDF in an inhumane and undignified manner such that the actions amounted to cruel and  
9 unusual punishment.  
10

11 41. Defendant LEROY BACA, is and at all times mentioned in this complaint was,  
12 acting in the course and scope of his employment as the Sheriff of Los Angeles County. As  
13 Sheriff, he is the chief executive officer of the Los Angeles Sheriff Department. According to  
14 California law as specified in Government Code §§26605 and 26610 and California Penal Code  
15 §4006, the Los Angeles County Sheriff is answerable for the safekeeping of the inmates in his  
16 custody. Specifically, Defendant BACA is responsible for the oversight, management and  
17 administration of policies of the County of Los Angeles with reference to local jails, including  
18 but not limited to housing practices, transportation, and, medical and dental services. This  
19 includes all matters relating to the selection, supervision, promotion, training, and discipline of  
20 the uniformed staff, including the supervisory security and medical staffs, of the County Jails.  
21 He is also responsible for the care, custody, and control of all inmates housed in the County Jails.  
22

23 42. Defendant LEROY BACA, in his capacity as Sheriff of Los Angeles County and  
24 the Defendant, COUNTY OF LOS ANGELES, implicitly or explicitly adopted and implemented  
25 careless and reckless policies, customs, or practices of allowing employees of the Century  
26  
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1 Regional Detention Facility to treat inmates in an undignified manner, provide substandard  
2 living conditions, refuse food, provide inadequate medical and dental care, ignore court orders,  
3 utilize excessive force, sexually harass inmates, refuse attorney consultations, and refuse access  
4 to the court.

5 43. The failure of the Defendant LEROY BACA and the COUNTY OF LOS  
6 ANGELES to adequately train and supervise the Defendants Avalos, Ortiz, jail employees,  
7 sheriff deputies and medical staff amounts to deliberate indifference to the right of Plaintiff to be  
8 free from cruel and unusual punishment, the right to be free of the use of excessive force by  
9 persons acting under the color of the law, the right to be free from sexual harassment, the right to  
10 freedom of association with her attorney, and, the right to a speedy trial under the First, Sixth,  
11 Eighth, and Fourteenth Amendments to the Constitution of the United States.  
12

13 44. The conduct of Defendants, and each of them, as alleged in this Complaint,  
14 subjected Plaintiff to unnecessary and wanton infliction of physical injury, humiliation,  
15 discomfort, pain, and emotional distress. Defendants also subjected Plaintiff to a serious risk of  
16 harm and/or death by failing to properly oversee her life threatening medical condition.  
17

18 45. In acting as alleged in this complaint, Defendants, and each of them, treated  
19 Plaintiff in an inhumane, undignified manner and violated Plaintiff's Eighth and Fourteenth  
20 Amendment right to be free of cruel and unusual punishment while a pre-trial detainee.  
21

22 46. In acting as is alleged in this Complaint, Defendants, and each of them, acted  
23 knowingly, willfully, and maliciously, and with reckless and callous disregard for Plaintiff's  
24 federally protected rights such that Plaintiff is entitled to relief under 42 U.S.C. §1983.  
25

26 47. In committing the acts complained of herein, Defendants acted under color of  
27 state law to deprive Plaintiffs of certain constitutionally protected rights including, but not  
28



1 limited to: a) the right to be free from cruel and unusual punishment; b) the right to freedom of  
2 association with her attorney; c) the right to be free from sexual harassment and abuse; d) the  
3 right to be free from physical assaults; e) the right to a speedy trial; and, f) the right to be free  
4 from excessive use of force by persons acting under color of state law.

5  
6  
7 **THIRD COUNT**  
8 **FOR VIOLATION OF CIVIL RIGHTS PURSUANT TO 42 U.S.C §1983**  
9 **AGAINST DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV**  
10 **YAROSLAVSKY, DON KNABE, AND MICHAEL D. ANTONOVICH**  
11 **(Failure to Implement Appropriate Policies, Customs and Practices)**

12 48. Plaintiff incorporates herein by reference paragraphs 1 through 47 as though fully  
13 set forth below.

14 49. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV  
15 YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH are members of the  
16 Board of Supervisors of Los Angeles County. The Board of Supervisors is the governing body  
17 of the County of Los Angeles, a charter county. As such, it has the function of serving as the  
18 executive and legislative head of the Los Angeles County. The Board of Supervisors is also  
19 directly responsible for establishing policy to guide the administrative functions of County  
20 departments including but not limited to Los Angeles County jails.

21 50. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV  
22 YAROSLAVSKY, DON KNABE, AND, MICHAEL D. ANTONOVICH have delegated their  
23 authority and are also responsible for the oversight of The Sybil Brand Commission for  
24 institutional inspections consists of ten commissioners, who were appointed by the Los Angeles  
25 County Board of Supervisors (two from each Supervisorial District). The Sybil Brand  
26 Commissioners conducts inspections of jails, lockups, probation and correctional facilities in the  
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1 Los Angeles County at least once each year. They may conduct additional inspections more  
2 often as the Commission may deem necessary or as directed by a judge of the Superior Court.  
3 These inspections involve a complete evaluation of the condition of each facility the members of  
4 the Commission or a committee of the Commission. These inspections are to involve a complete  
5 evaluation of the condition of each facility's effective and economical administration,  
6 cleanliness, discipline and comfort of its inmates. Plaintiff is informed and believes and thereon  
7 alleges that the Commission issues an annual report to the Los Angeles County Board of  
8 Supervisors concerning its evaluation of the facilities it has inspected.  
9

10 51. At all times mentioned herein, DEFENDANTS GLORIA MOLINA, MARK  
11 RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, and, MICHAEL D.  
12 ANTONOVICH, knew or should have known that the conditions of the Century Regional  
13 Detention Facility were ineffective, unclean and subjected inmates to the risk of harm and even  
14 the risk of death. Defendants and each of them failed in the oversight, management and  
15 administration of the County of Los Angeles with reference to local jails, including but not  
16 limited to housing practices, transportation, and, medical and dental services. Furthermore,  
17 Defendants and each of them, knew or should have known that Los Angeles County employees  
18 that caused harm to Plaintiff were unfit to perform the work for which they were hired and that  
19 this unfitness created a particular risk of harm to Plaintiff and the public at large.  
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22 52. Notwithstanding the delegation of authority to the Sybil Brand Commission, their  
23 knowledge of the unlawful customs and practices of jail employees as well as the claims filed by  
24 Plaintiff, DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV  
25 YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH have failed to conduct  
26 meaningful policies, customs and practices concerning the use of excessive force, improper strip  
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1 searches, substandard facilities, substandard medical and dental care, render guilty deputies  
2 accountable for sexual harassment and inmate abuse, and repeatedly ignored evidence that  
3 deputies and other Los Angeles County officials are covering up incidents of excessive force,  
4 sexual harassment, inmate torture, substandard medical care, improper strip searches and overall  
5 prisoner abuse.

6  
7 53. The actions of DEFENDANTS GLORIA MOLINA, MARK RIDLEY-  
8 THOMAS, ZEV YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH as  
9 referenced herein are so common and well settled that they constitute a custom among Los  
10 Angeles County Sheriff Deputies and Los Angeles County jail employees as to represent a  
11 custom, practice and/or policy that is implicitly or explicitly adopted and authorized by  
12 DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY,  
13 DON KNABE, and, MICHAEL D. ANTONOVICH in their official capacity as members of the  
14 Los Angeles County Board of Supervisors who are responsible for the administration of policies  
15 that govern the functioning of jails.  
16

17  
18 54. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV  
19 YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH in their official  
20 capacity, implicitly or explicitly adopted and implemented careless and reckless policies,  
21 customs, or practices, that included, among other things, of allowing employees of the Century  
22 Regional Detention Facility to treat inmates detained at CRDF in an inhumane and undignified  
23 manner such that the actions amounted to cruel and unusual punishment.  
24

25 55. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV  
26 YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH, implicitly or explicitly  
27 adopted and implemented careless and reckless policies, customs, or practices of allowing  
28

1 employees of the Century Regional Detention Facility to treat inmates, including but not limited  
2 to Plaintiff, undignified and inhumane treatment, sexual abuse and harassment, substandard  
3 living conditions, food deprivation, inadequate medical and dental care, refusals to adhere to  
4 court orders regarding medical services and showers, utilizing excessive force, sexually  
5 harassment, refusals of attorney consultations, and refusing access to the court.  
6

7 56. The failure of DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS,  
8 ZEV YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH to adopt and  
9 implement policies that protected Plaintiff's right to be free from cruel and unusual punishment,  
10 the use of excessive force by persons acting under the color of the law, sexual harassment,  
11 violations of the right to freedom of association with her attorney, and, deprivation of her right to  
12 a speedy trial constituted violations of Plaintiff's rights as set forth in the First, Sixth, Eighth, and  
13 Fourteenth Amendments to the Constitution of the United States.  
14

15 57. In acting as is alleged in this Complaint, DEFENDANTS GLORIA MOLINA,  
16 MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, and, MICHAEL D.  
17 ANTONOVICH acted knowingly, willfully, and maliciously, and with reckless and callous  
18 disregard for Plaintiff's federally protected rights such that Plaintiff is entitled to relief under 42  
19 U.S.C. §1983.  
20

21 58. In committing the acts complained of herein, DEFENDANTS GLORIA  
22 MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, and,  
23 MICHAEL D. ANTONOVICH acted under color of state law as members of the Los Angeles  
24 County Board of Supervisors to deprive Plaintiffs of certain constitutionally protected rights  
25 including, but not limited to: a) the right to be free from cruel and unusual punishment; b) the  
26 right to not be detained in a Los Angeles County jail facility under inhumane and undignified  
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1 conditions; c) the right to freedom of association with her attorney; d) the right to be free from  
2 sexual harassment by Los Angeles County employees; e) the right to a speedy trial; f) the right to  
3 receive adequate medical and dental care while in the custody of Los Angeles County  
4 employees; and, g) the right to be free from excessive use of force by persons acting under color  
5 of state law.  
6

7  
8 **FOURTH COUNT**  
9 **FOR VIOLATION OF CIVIL RIGHTS PURSUANT TO 42 U.S.C §1983**  
10 **AGAINST DEFENDANTS LEROY BACA, SHERIFF DEPUTY ORTIZ, SHERIFF**  
11 **DEPUTY AVALOS, SHERIFF DEPUTY SHANE PARKS and THE COUNTY OF LOS**  
12 **ANGELES**  
13 **(Cruel and Unusual Punishment)**

14 59. Plaintiff incorporates herein paragraphs 1 through 58 as though fully set forth  
15 below.

16 60. From November 15, 2011 to December 17, 2011, Plaintiff was a pre-trial detainee  
17 being held on misdemeanor charges at the Century Regional Detention Facility. During that  
18 time Plaintiff experienced the following:

19 a. On November 15, 2011, while at awaiting arraignment, Plaintiff was chained at  
20 the waist with both hands cuffed at her waist by Los Angeles County Deputy Sheriffs. Plaintiff  
21 did not present a security risk. During arraignment, a medical order was issued instructing Los  
22 Angeles County medical employees to monitor Plaintiff's International Normalized Ratio (INR)  
23 because of the anticoagulant, Coumadin, she is required to take daily. Coumadin affects the  
24 function of the coagulation cascade and helps inhibit the formation of blood clots. It is  
25 prescribed on a long-term basis to people who have experienced recurrent inappropriate blood  
26 clotting. INR monitors the effectiveness of Coumadin. When Plaintiff arrived at CRDF, she  
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1 informed the medical personnel that she takes 7.5 mg of Coumadin daily and needed to have a  
2 blood test to monitor her INR because she had missed several doses of her medication since her  
3 incarceration. The request was ignored. Plaintiff's medical service providers have determined  
4 that Plaintiff's INR should be between 2.0 and 3.0 to avoid the recurrence of blood clots in her  
5 legs and lungs.

6  
7 b. Plaintiff was not allowed to shower until November 18, 2011 and only because  
8 her attorney submitted a complaint to the watch commander.

9 c. On November 16, 2011, Los Angeles County medical employees began to  
10 dispense Coumadin to Plaintiff at 7.5 mg without taking a blood test to determine her INR.

11 d. On November 17, 2011, Plaintiff was then taken to cell 7 in the reception area of  
12 CRDF with a chain around her waist and both hands cuffed. While standing in cell 7, Plaintiff  
13 became nauseous and short of breath. She was taken to the medical unit where her blood  
14 pressure, heart rate and oxygenation rate were taken. Dr. Chong then approached Plaintiff and  
15 said she was okay. Plaintiff asked Dr. Chong whether he ruled out a blood clot. Dr. Chong  
16 responded there was no clot because Plaintiff's INR was 2.0. Plaintiff asked how he knew her  
17 INR. He said he'd checked her chart. Plaintiff informed Dr. Chong there had been no blood draw  
18 since she arrived at the facility. Dr. Chong excused himself and returned and said he'd been  
19 reading last year's (2010) chart. He then requested a lab tech draw Plaintiff's blood. The lab tech  
20 asked Deputy De Santo, the escorting officer, to remove one of Plaintiff's handcuffs so that the  
21 lab tech could look for a place to draw Plaintiff's blood. Deputy De Santa refused. The lab tech  
22 then attempted to draw blood from Plaintiff's hand several times and was unable to draw any  
23 blood. Before returning to the reception area, Plaintiff requested that Deputy DeSanto allow her  
24 to use the restroom. Deputy De Santo stated that it would be better to go to the restroom in the  
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1 reception area. When Plaintiff returned to the reception area, she was placed inside cell 7. She  
2 asked Deputy De Santo to remove one of the handcuffs so she could use the toilet. Deputy De  
3 Santo refused. Plaintiff had to wait for nearly three hours until she could utilize the toilet at  
4 LAX court. Removal of at least one of the handcuffs was particularly critical because Plaintiff  
5 was menstruating and could not reach the old pad or place a new pad with both hands chained to  
6 her waist. Neither could she utilize toilet tissue.  
7

8 e. On the evening of November 17, 2011, Plaintiff was returned to CRDF taken to  
9 the 2300 module. A female deputy offered to bring Plaintiff to her cell. The female deputy asked  
10 Plaintiff to remove all of her clothes except her underwear. Plaintiff took off everything except  
11 the bra and panties. The female deputy then told Plaintiff to take off the bra, pull down the  
12 underwear and "open your vagina and cough." Plaintiff pulled down the panties, opened her  
13 inner thighs and coughed. The female deputy said that was not good enough. Plaintiff informed  
14 the deputy that she was having her period and experiencing an extremely heavy flow. The  
15 deputy told Plaintiff to remove the sanitary pads and open her vagina. Plaintiff refused. The  
16 deputy told Plaintiff, "I guess you want to stay like that all night." She then chained Plaintiff's  
17 right hand to the door of the cell. Plaintiff had no clothing except the panties. The deputy also  
18 confiscated Plaintiff's attorneys' business cards. Deputy Ortiz walked by Plaintiff's cell and  
19 asked whether Plaintiff was ready to cooperate. Plaintiff told her she'd done the best she could.  
20 Approximately forty five minutes later, Plaintiff manipulated her right hand out of the handcuff.  
21 Plaintiff asked the count deputy for clothes and she refused to give Plaintiff any clothes. That  
22 evening, Plaintiff slept in a cold, air conditioned cell at approximately forty (40) degrees without  
23 clothes.  
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1 f. On November 18, 2011, Plaintiff again requested clothes and was refused. At  
2 approximately 12:00 p.m., a black man from the psych department visited the cell and said he  
3 had questions to ask Plaintiff. Plaintiff told him she was not dressed and didn't think it was  
4 appropriate for him to question her without clothes. He said that Plaintiff was covered in a  
5 blanket and that was sufficient. Plaintiff told him that she had not been allowed a shower since I  
6 arrived at CRDF. She also told him about the incident the night before when she was chained to  
7 the door with just panties on. She told him she wanted to speak with a supervisor to file a  
8 grievance and he said he didn't believe that would be possible. Plaintiff answered some of his  
9 questions and then told him he should return at another time when she was more appropriately  
10 dressed. At approximately 3:00 p.m., Plaintiff received a visit from my attorney. The deputies  
11 then scrambled to provide her clothes. Plaintiff's attorney complained that she had not been  
12 allowed to shower or receive appropriate medical attention e.g. having my INR checked.  
13 Plaintiff was allowed a shower after the attorney visit. Her INR was not checked.  
14

15 g. On November 21, 2011, Plaintiff was transported from CRDF to the criminal  
16 courts building. Plaintiff was chained and handcuffed with her hands at my waist from 6:45 a.m.  
17 to 5:45 p.m. (11 Hours) and kept inside cell 2 the entire time. Plaintiff was not allowed to appear  
18 in court notwithstanding her attorney's repeat requests throughout the day that Plaintiff be  
19 brought to court. When Plaintiff asked the deputies why she had not appeared in court, they said  
20 it was a "dry run" and that sometimes happens. Plaintiff's attorney later told her that he had been  
21 requesting that she be brought to court and the deputies told him they could not locate Plaintiff.  
22 The artificial "dry run" interfered with Plaintiff's right to a speedy trial and her right to  
23 communicate with her attorney.  
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1 h. On November 23, 2011, Plaintiff returned to the criminal courts building.  
2 Plaintiff's attorney asked the deputies to bring her to the 4th floor in approximately 20 minutes  
3 so they could have a confidential discussion. The deputy agreed. Plaintiff was returned to cell  
4 no. 2 and twenty minutes later she was shipped on a bus to CRDF. Before boarding the bus,  
5 Plaintiff asked the deputies to telephone Department 40. They refused. She asked to speak with  
6 a supervisor and that request was also refused. This act also interfered with Plaintiff's right to a  
7 speedy trial and my right to communicate with my attorney. Plaintiff arrived at CRDF at  
8 approximately 11:30 a.m. and was placed in cell 7 with both hands cuffed at her waist. Plaintiff  
9 stood inside of cell 7 for four hours. At approximately, 3:30 p.m., Plaintiff was taken to module  
10 2300 where Deputies Ortiz and Avalos stood waiting. Each officer grabbed an arm and walked  
11 Plaintiff to the cell. They asked Plaintiff to remove her clothes and bend over and open her  
12 vagina. Plaintiff removed her clothes, pulled down the underwear, pulled on her inner thighs and  
13 coughed. Plaintiff pulled up the underwear and turned around to look at the officers. They both  
14 yelled "we didn't see you, do it again." Plaintiff asked what were they doing and they said they  
15 weren't looking. Plaintiff repeated the routine twice and they insisted she didn't "search out"  
16 properly. Plaintiff asked Deputies Ortiz and Avalos to get their supervisor so that a supervisor  
17 could determine whether she "searched out" properly. Both deputies refused. Deputy Ortiz said,  
18 "[f]ine, you must want to stay like that all night and you don't want to eat." Deputy Avalos left to  
19 get scissors, returned and cut the bra and shirt off the chain. Deputy Avalos stated that Plaintiff  
20 shouldn't be out committing crimes and she wouldn't be in jail. She also said that Plaintiff was  
21 "nothing." She bragged that she and Deputy Ortiz would be at home with their families over the  
22 holidays and Plaintiff would be in jail. Deputy Ortiz bragged that she had a rich husband and she  
23 worked because her "man don't mind." She also said that she was there earning extra money for  
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1 her family "babysitting (Plaintiff)." Plaintiff grabbed the slack on the chain so that she could use  
2 the toilet if necessary. Deputy Ortiz took Plaintiff's lunch and some notes that she had written  
3 concerning her case. Plaintiff was chained to the door with pants and no bra or shirt. There was a  
4 dirty shirt on the floor of the cell that she'd left that morning. Plaintiff put on dirty shirt which  
5 she wore until she was allowed a shower on December 2, 2011. A trustee gave Plaintiff dinner  
6 and then asked Plaintiff to return the dinner because she was instructed to not give Plaintiff the  
7 meal. Plaintiff refused to return the dinner. Deputy Ortiz called on the intercom and said "I hope  
8 you enjoyed your dinner because tomorrow you ain't gettin' shit and we will be at home with our  
9

10 families enjoying Thanksgiving dinner and you will be here." Approximately 30 minutes later,  
11 Deputy Ortiz returned to the cell and asked whether Plaintiff was ready to cooperate. Plaintiff  
12 told her she did the best she could. Approximately 30 minutes later, Deputy Moreno called and  
13 asked whether Plaintiff was ready to cooperate. Plaintiff told her she would do what she'd done  
14 before and Deputy Moreno said that was not good enough. Deputy Moreno then came to the cell  
15 and asked whether Plaintiff was ready to "search out." Plaintiff stood up, pulled down her  
16 underwear, held open her inner thighs and coughed. Deputy Moreno said that was not  
17 appropriate. Plaintiff told her not to return because she believed that she was playing a game and  
18 simply wanted to view her rear end. Plaintiff stayed handcuffed to the door for approximately 6  
19 hours. Deputy Moreno took off the cuffs at approximately 12:00 a.m.  
20  
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22 i. On November 29, 2011, the court issued a second medical order and a shower  
23 order. Plaintiff returned to CRDF at approximately 3:30 p.m. and was taken to the 2300 module  
24 where Deputies Ortiz, Avalos and Garcia were waiting to bring Plaintiff to the cell. The deputies  
25 asked for Plaintiff's clothes and bra. Plaintiff complied. They then asked Plaintiff to lift her  
26 breasts and turn around, bend over, open her vagina and cough. Plaintiff bent over, opened her  
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28

1 inner thighs and coughed. They said that was not good enough. Deputy Ortiz took Plaintiff's  
2 pants and her lunch and said, "you must not want to eat and you must want to stay like that all  
3 night." Plaintiff grabbed the chain so that she could use the toilet if need be. The deputies left  
4 Plaintiff chained to the door with just a shirt. Plaintiff decided to engage in a protest and banged  
5 a handcuff on the door of the cell for approximately two hours. Deputy Avalos pretended she  
6 was going to unlock the handcuff and instead locked both handcuffs onto Plaintiff's left hand  
7 and tightened them to the point that Plaintiff's wrist was swollen and red. Deputy Avalos also  
8 pulled on the slack of the chain and Plaintiff tried to prevent her from doing so. Deputy Avalos  
9 pulled on the chain so hard that the chain cut the baby finger of Plaintiff's left hand. Deputy  
10 Ortiz instructed the trustees to not serve Plaintiff dinner and they did not. Plaintiff remained  
11 chained to the door until approximately six thirty or seven o'clock when a male deputy, Ramirez,  
12 unlocked the handcuffs.

15 j. On November 30, 2011, Plaintiff was awakened at approximately 8:30 a.m. by the  
16 morning nurse and the nurse practitioner "Bachelor." They asked whether they could draw  
17 Plaintiff's blood for an INR check. Plaintiff agreed. Ms. Bachelor apologized for ignoring  
18 Plaintiff's requests for two weeks prior and indicated that she had received a court order  
19 instructing that Plaintiff's INR be taken. Plaintiff informed Ms. Bachelor that she needed a  
20 special diet and Ms. Bachelor indicated she would return to discuss the special diet. Ms.  
21 Bachelor never returned not to Plaintiff's cell to discuss her INR, a special diet, or any other  
22 medical issues that Plaintiff had. A blood draw was taken and Plaintiff bled for approximately  
23 45 minutes and bled through four gauze bandages.

26 k. On the evening of November 30, 2011, Plaintiff asked the evening nurse for an  
27 antibiotic ointment for the wound on her left hand caused by Deputy Avalos. Deputy Avalos  
28

1 accompanied the evening nurse and said no to my request for an antibiotic ointment. Deputy  
2 Avalos closed the chute of the cell door and walked away. On a prior occasion, Deputy Avalos  
3 refused Plaintiff's Coumadin medication because Plaintiff asked for ointment for a rash on her  
4 left wrist. Specifically, Deputy Avalos attempted to touch the affected area of Plaintiff's left  
5 wrist, Plaintiff told her not to touch her me and pulled away her left hand. Deputy Avalos was  
6 agitated and slammed the chute and did not allow the nurse to give Plaintiff her medication that  
7 evening.  
8

9 l. On December 1, 2011, the medical staff stopped dispensing Coumadin to  
10 Plaintiff.

11 m. On December 2, 2011, Plaintiff was taken to the criminal courts building for a  
12 hearing. Plaintiff was not allowed to go to court despite her attorney's request that she be  
13 brought to the courtroom. Plaintiff was returned to CRDF on the afternoon bus. I was returned to  
14 the module, allowed to shower by a female officer. That evening, Deputy Avalos began a  
15 pattern of not allowing Plaintiff to throw out her trash by not opening the shoot so the trustees  
16 can retrieve trash.  
17

18 n. On December 3, 2011, a Caucasian man visited the cell and said he was a  
19 psychiatrist. He told Plaintiff that he thinks she may be bipolar. Plaintiff asked him what caused  
20 him to reach that conclusion he said he had read some notes that indicated Plaintiff was  
21 "irritable." He then asked whether Plaintiff desired any psychiatric meds or sleeping pills and  
22 Plaintiff refused his request. He also told me that her INR had returned 4.4, which is twice the  
23 level that it should have been.  
24

25 o. On December 12, 2011, Ms. Boyles from the psychiatric unit asked Plaintiff  
26 whether Plaintiff had a "problem" with the deputies. Plaintiff told Ms. Boyles about the  
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1 "searching out" situation with Deputies Ortiz and Avalos and all of the other issues she was  
2 having. Ms. Boyles asked whether Plaintiff filled out a grievance form. Plaintiff explained that  
3 she had no access to a grievance process because she was kept inside of the cell 24 hours a day  
4 unless she went to court. Ms. Boyles said the deputies told her they did not allow Plaintiff out of  
5 the cell because Plaintiff was "hostile and aggressive." Ms. Boyles wanted to know Plaintiff's  
6 response. Plaintiff told her that her response was the explanation she had given about the way  
7 she had been treated while incarcerated. Ms. Boyles said she would return that afternoon and  
8 attempt to get Plaintiff out of the cell for a shower. Ms. Boyles never returned and Plaintiff did  
9 not receive a shower. That evening, Deputy Avalos accompanied the evening nurse with  
10 medication. Avalos snatched Plaintiff's medication away from the nurse, placed the pills inside a  
11 small white cup, and put the cup on the floor and pushed them under the door. Plaintiff refused to  
12 take the medication.  
13  
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15 p. From November 17, 2011 to November 30, 2011, Plaintiff was dispensed  
16 Coumadin without anyone checking her INR. Plaintiff requests to have her INR checked went  
17 ignored. Once the medical staff discovered Plaintiff's INR was 4.4, twice the level it should  
18 have been, Plaintiff's Coumadin was discontinued altogether from December 1, 2011 until her  
19 release on December 17, 2011. After her release on December 17, 2011, Plaintiff immediately  
20 had a blood test and discovered her INR was 1.0 which meant she was subjected to clotting and a  
21 heart attack or stroke.  
22

23 q. On November 15, 2011, Plaintiff received a K12 classification by Los Angeles  
24 County jail employees with no medical, legal or factual basis. The K12 classification caused  
25 Plaintiff to be dressed in yellow and blue which inferred that Plaintiff had psychiatric issues.  
26 Plaintiff was never formally diagnosed by a physician qualified to make such an assessment.  
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1           r.       During the entire time Plaintiff was incarcerated at CRDF, the cell was never  
2 cleaned. Furthermore, Plaintiff remained inside of the cell 24 hours a day unless she was  
3 transported to court. She did not have any physical activity or mental stimulation. And, she  
4 received three showers during the entire incarceration.

5           61.     On January 9, 2013, Plaintiff was arrested by the Los Angeles County Sheriff  
6 Department while travelling east on the Culver City Expo Train by Los Angeles County Sheriff  
7 Deputy Shane Parks (Badge Number 455174). During the arrest, Deputy Shane Parks stood  
8 behind Plaintiff, with one hand on her waist and the other on the hand cuffs. He repeated  
9 touched Plaintiff's buttocks and Plaintiff asked him to stop. He then started twisting Plaintiff's  
10 hands against the handcuffs. Plaintiff again asked him to stop because he was hurting her and he  
11 refused. Deputy Shane Parks continued to twist Plaintiff's wrists against the handcuffs until he  
12 caused visibly red marks and scars. When additional officers arrived, Deputy Shane shouted "we  
13 have a spitter." A female officer then went to her vehicle to retrieve a spitting mask which she  
14 placed on Plaintiff's head. Plaintiff arrived at Century Regional Detention Facility for booking  
15 at approximately 9:00 p.m. Deputy Shane Parks then announced "she spit on a deputy."  
16 Numerous deputies then surrounded Plaintiff and took her to a holding cell. While inside the  
17 holding cell, two female officers, one them being female Deputy Nalls, began to search Plaintiff.  
18 After searching Plaintiff, the deputies decided to remove Plaintiff's bra. The deputies then lifted  
19 Plaintiff's shirt and exposed her breasts in the presence of male officers. Plaintiff asked Deputy  
20 Nalls to not expose her breasts in the presence of male officers and Deputy Nalls stated, "don't  
21 worry, they can't see anything." However, the male officers were unquestionably positioned so  
22 that Plaintiff's breasts were in their plain view. Plaintiff was left inside of the holding cell,  
23 handcuffed with her hands behind her back and the spitting mask on her head for approximately  
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1 twelve (12) hours. Plaintiff did not receive water, food or a blanket during that time. Neither  
2 could she use the toilet. Plaintiff was charged with two misdemeanors and an infraction and held  
3 on a \$25,000 bail. On January 25, 2013, Plaintiff was transported to the criminal courts  
4 building for a scheduled court appearance in Division 40. Her attorney, Joseph McInnis,  
5 requested an attorney consultation and was refused by Los Angeles County Sheriff Deputies. He  
6 was told that Plaintiff was a "miss out." The truth is that Plaintiff was not a "miss out" and was  
7 being held inside of holding cell number two at the Criminal Courts Building from  
8 approximately 6:30 a.m. to 6:30 p.m. Plaintiff was chained and handcuffed with three other  
9 women who had obvious mental health issues such that they removed their clothing and engaged  
10 in sex acts with themselves. During that time, Plaintiff could not utilize the toilet or eat. When  
11 Plaintiff asked sheriff deputies about the status of her case, Plaintiff was told the court had not  
12 called her case for hearing. Attorney Joseph McInnis informed Plaintiff that the court did in fact  
13 call her matter for hearing and the court was informed by sheriff deputies that Plaintiff was a  
14 "miss out." Los Angeles County Sheriff Deputies misrepresented this fact knowing that Plaintiff  
15 was being held inside of holding cell number two because inmates are electronically monitored  
16 from the time they leave CRDF to the time they return to CRDF. Additionally, there is a sign in  
17 sheet outside of the holding cell that deputies sign attesting they have checked on the status of  
18 the inmates inside of the holding cell. As a result of the misrepresentation that Plaintiff was a  
19 "miss out," Plaintiff's case was continued to January 29, 2013 and she lost four (4) days of her  
20 right to a speedy trial.  
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25 62. The Defendant, County of Los Angeles, has adopted policies, procedures,  
26 practices or customs within the Los Angeles County Sheriff's Department generally, and CRDF  
27 specifically, that allow, among other things, the use of cruel and unusual punishment, sexual  
28

1 abuse and harassment, physical assaults and excessive force, improper classifications, inadequate  
2 housing conditions, and inadequate medical care.

3         63. Defendant Leroy Baca, as the chief executive of the Los Angeles Sheriff's  
4 Department, is responsible for the supervision and oversight of deputies within his department.  
5 Defendant Baca is also responsible for the safekeeping of the inmates in the custody of the Los  
6 Angeles Sheriff's Department. California Government Code §§26605 and 26610; California  
7 Penal Code §4006. Specifically, Defendant BACA is responsible for the oversight, management  
8 and administration of policies of the County of Los Angeles with reference to local jails,  
9

10 including but not limited to housing practices, transportation, and, medical and dental services.  
11 This includes all matters relating to the selection, supervision, promotion, training, and discipline  
12 of the uniformed staff, including the supervisory security and medical staffs, of the County Jails.  
13

14         64. By allowing the acts of the sheriff deputies referenced *infra* and failing to  
15 implement policies and procedures which would prevent such occurrences, Defendant Baca  
16 essentially acquiesced in the actions of said Deputies.  
17

18         65. The actions of Defendant Baca and Defendant County of Los Angeles amount to  
19 deliberate indifference to the right of Plaintiff to be free of cruel and unusual punishment,  
20 inadequate medical care, inadequate medical conditions, and, excessive force under the Eighth  
21 and Fourteenth Amendments to the Constitution of the United States.  
22

23         66. As a result of the deliberate indifference to Plaintiff's rights by Defendant Baca  
24 and Defendant County of Los Angeles and its agents, servants and employees, Plaintiff suffered  
25 personal injuries, humiliation and emotional distress and is entitled to relief under 42 U.S.C.  
26 §1983.  
27  
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**FIFTH COUNT**  
**FOR VIOLATION OF CIVIL RIGHTS PURSUANT TO 42 U.S.C §1983**  
**AGAINST DEFENDANTS LEROY BACA, and THE COUNTY OF LOS ANGELES**  
**(Interference with Right to a Speedy Trial and Freedom of Association)**

67. Plaintiff incorporates herein paragraphs 1 through 66 as though fully set forth below.

68. In committing the acts complained of herein, Defendants LEROY BACA AND THE COUNTY OF LOS ANGELES acted under color of state law by preventing Plaintiff from consulting with her attorney and appearing in court when she was scheduled to do so.

Defendants' acts of detaining Plaintiff in a holding cell when she was scheduled to appear in court, and, preventing her from consulting with her attorney, had no basis in fact or law and therefore violated Plaintiff's right to a speedy trial as guaranteed by the Sixth Amendments to the Constitution of the United States.

69. As a direct and proximate result of the violation of Plaintiff's constitutional right to a speedy trial by Defendant BACA and the employees, agents, servants and assigns of Defendant County of Los Angeles, Plaintiff has suffered special damages as alleged in this Complaint and is entitled to relief under 42 U.S.C. §1983.

**SIXTH CLAIM FOR**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**(AGAINST DEFENDANTS LOS ANGELES COUNTY, DEFENDANT LEROY**  
**BACA, DEPUTY SHERIFF AVALOS, DEPUTY SHERIFF ORTIZ AND DEPUTY**  
**SHERIFF SHANE PARKS)**

70. Plaintiff incorporates herein by reference paragraphs 1 through 69 as though fully set forth below.

1           71. Defendants LEROY BACA, SHERIFF DEPUTY ORTIZ, SHERIFF DEPUTY  
2 AVALOS AND LOS ANGELES COUNTY, at all times referenced herein, owed a duty to  
3 Plaintiff to not engage in discriminatory conduct, to not be physically and emotionally abusive to  
4 Plaintiff and to provide proper and adequate medical care and supervision of Plaintiff's medical  
5 condition. Specifically, Defendant BACA has a duty to provide adequate and appropriate  
6 oversight, management and administration of policies of the County of Los Angeles with  
7 reference to local jails, including but not limited to housing practices, transportation, and,  
8 medical and dental services.  
9

10           72. Defendants and each of them knew, or should have known, that their misconduct  
11 as set forth herein would cause Plaintiff to experience severe emotional distress.  
12

13           73. Defendants and each of them breached their duty of care to Plaintiff as a housed  
14 inmate of Century Regional Detention Facility as referenced *infra*.

15           74. As a direct and proximate result of Defendants, and acts of cruel and unusual  
16 punishment, substandard medical care and violation of Plaintiff's First, Sixth, Eighth and  
17 Fourteenth Amendment Constitutional rights, as well as Defendants physical and emotional  
18 abuse Plaintiff, Plaintiff has suffered and continues to suffer severe emotional distress and  
19 mental suffering, all to her damage in an amount to be established at trial.  
20  
21

22  
23                           **SEVENTH CLAIM FOR**  
24                           **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
25                           **(AGAINST ALL DEFENDANTS LOS ANGELES COUNTY, DEFENDANT LEROY**  
26                           **BACA, DEPUTY SHERIFF AVALOS AND DEPUTY SHERIFF ORTIZ)**

27           75. Plaintiff incorporates herein by reference paragraphs 1 through 74 as though fully  
28 set forth below.

1           76.     At all times referenced herein, the employees of DEFENDANT COUNTY OF  
2     LOS ANGELES e.g. DEFENDANT LEROY BACA, DEPUTY SHERIFF ORTIZ AND  
3     DEPUTY SHERIFF AVALOS acted within the scope of their employment with DEFENDANT  
4     COUNTY OF LOS ANGELES.

5           77.     As a direct and proximate result of the misconduct referenced herein, Plaintiff has  
6     suffered extreme emotional psychological distress, severe harm and anguish including but not  
7     limited to physical and emotional abuse. Additionally, the actions of DEFENDANTS DEPUTY  
8     SHERIFF ORTIZ AND DEPUTY SHERIFF AVALOS and Does 1 thru 25 as referenced herein  
9

10     were specifically designed to embarrass, harass, humiliate and annoy Plaintiff. Plaintiff has  
11     suffered damages and continues to suffer damages in an amount to be established at trial.  
12

13           78.     Defendants, and each of their actions as referenced herein, particularly the  
14     physical and emotional abuse and disparaging comments regarding Plaintiff, were knowing,  
15     intentional, and willful, because they had full knowledge or knew with substantial certainty of  
16     the extreme emotional psychological distress, severe harm, and anguish that their conduct would  
17     cause Plaintiff or any person of ordinary sensitivity. Said conduct was outrageous and intended  
18     to cause harm and emotional distress to Plaintiff and Plaintiff has in fact experience  
19     psychological and emotional harm as set forth below.  
20

21           79.     The conduct of Defendants was outrageous, intentional, malicious and oppressive,  
22     and done with a wanton and reckless disregard of the consequences to Plaintiff. Defendants also  
23     knew or should have known that their physical and emotional abuse would cause Plaintiff  
24     psychological and emotional harm. Notwithstanding the foregoing, Defendants intended for  
25     their conduct to humiliate, annoy and embarrass Plaintiff. Plaintiff is therefore entitled to  
26     punitive damages in amount to be established at trial.  
27  
28

**EIGHTH CLAIM FOR DEFAMATION  
(AGAINST DEFENDANT LOS ANGELES COUNTY, DEFENDANT LEROY BACA  
AND DOES 1 THRU 25)**

80. Plaintiff incorporates herein by reference paragraphs 1 through 79 as though fully set forth below.

81. DEFENDANT LOS ANGELES COUNTY and its employees, agents, servants and assigns individually and in their capacity as employees of DEFENDANT LOS ANGELES COUNTY made false representations to the public about Plaintiff's mental status and/or condition as an inmate within a Los Angeles County jail facility. Specifically, Defendant LOS ANGELES COUNTY and its agents, employees, servants and assigns forced Plaintiff to wear yellow shirts and blue pants, representing that she was an inmate with a medically diagnosed psychological condition.

82. Defendants, and each of them, knew the representation of wearing yellow shirts and blue pants was false in that Plaintiff has never been medically diagnosed with a psychological condition. Defendants intended that the representation of wearing yellow shirts and blue pants to subject and expose Plaintiff to hatred, contempt, ridicule and shame.

83. While wearing a yellow shirts and blue pants, a judicial officer of the Los Angeles Superior Court stated openly in during a court hearing, "I am not worried about what she has to say. Look at what she is wearing, she is obviously crazy." The judicial officer apparently believed the negative and false connotation of wearing yellow shirts and blue pants and viewed Plaintiff in a negative light as a result.

84. As a direct and proximate cause of the false representation of wearing yellow shirts and blue pants, Plaintiff has experienced embarrassment, hurt feelings and mortification as

1 a result of the statement made by the judicial officer of the Los Angeles Superior Court and the  
2 false representation that she had been medically diagnosed with a mental condition.

3 85. Defendants knew that forcing Plaintiff to wear yellow and blue represented that  
4 she had been diagnosed with a mental condition, and, they knew that such a representation was  
5 false. Defendants intended to place Plaintiff in a false and negative light to the public and  
6 specifically, her attorneys, Los Angeles County employees and Los Angeles County judicial  
7 officers.  
8

9 86. Because of the intentional nature of Defendants false representations about  
10 Plaintiff, Plaintiff is entitled to punitive damages in an amount to be established at trial.  
11

12  
13 **NINTH CLAIM FOR BATTERY**  
14 **(AGAINST LOS ANGELES COUNTY, DEFENDANT LEROY BACA, DEPUTY**  
15 **SHERIFF AVALOS AND DEPUTY SHERIFF ORTIZ)**

16 87. Plaintiff incorporates herein by reference paragraphs 1 through 88 as though fully  
17 set forth below.

18 88. From November 15, 2011 through December 17, 2011, Plaintiff was housed as a  
19 pre-trial inmate at the Century Regional Detention Facility under the care and supervision of  
20 DEFENDANTS LOS ANGELES COUNTY AND DEFENDANT LEROY BACA.

21 89. On November 29, 2011, Plaintiff was taken to LAX court for a pre-trial hearing.  
22 When Plaintiff arrived at Century Regional Detention Facility, she was taken to the 2300 module  
23 where Sheriff Deputies Ortiz, Avalos and Garcia were waiting to bring her to her cell. The  
24 deputies asked Plaintiff for her clothes and my bra. They then asked her to lift my breasts and  
25 turn around, bend over, open her vagina and cough. Plaintiff bent over, opened her inner thighs  
26 and coughed. The sheriff deputies stated that was not good enough. DEFENDANT DEPTUY  
27  
28



1 ORTIZ took Plaintiff's pants and her lunch and said, "you must not want to eat and you must  
2 want to stay like that all night." Plaintiff grabbed the chain used to restrain her so that she could  
3 use the toilet if need be. DEFENDANT DEPUTY AVALOS returned and pretended she was  
4 going to unlock the handcuff on Plaintiff's wrist and instead locked both handcuffs onto  
5 Plaintiff's left hand and tightened them to the point that her wrist became swollen and red.  
6 DEFENDANT DEPUTY AVALOS also pulled on the slack of the chain so hard that the chain  
7 cut Plaintiff's baby finger of her left hand. DEFENDANT SHERIFF DEPUTY ORTIZ then  
8 instructed the trustees to not serve Plaintiff dinner and they did not. Plaintiff stayed chained to  
9 the door until approximately four hours until a male deputy officer Ramirez unlocked the  
10 handcuffs.  
11

12  
13 90. Plaintiff was arrested on January 9, 2013 by Sheriff Deputy Shane Parks. During  
14 the arrest, Plaintiff was physically assaulted and touched inappropriately by male sheriff deputy  
15 Shane Parks.

16  
17 91. Plaintiff did not consent to the touching by the employees of DEFENDANT LOS  
18 ANGELES COUNTY.

19  
20 92. As a direct and proximate result of the touching by the employees of  
21 DEFENDANT LOS ANGELES COUNTY, Plaintiff was physically abused and assaulted,  
22 harassed, injured emotionally, and damaged in an amount that will be established at trial.

23 ///

24 ///

25 ///

26 ///

**TENTH CLAIM FOR  
NEGLIGENT HIRING AND SUPERVISION  
(AGAINST DEFENDANTS LEROY BACA, GLORIA MOLINA, MARK RIDLEY-  
THOMAS, ZEV YAROSLAVSKY, DON KNABE, MICHAEL D. ANTONOVICH, AND,  
LOS ANGELES COUNTY)**

93. Plaintiff incorporates herein by reference paragraphs 1 through 92 as though fully set forth below.

94. Defendant LEROY BACA, is and at all times mentioned in this complaint was, acting in the course and scope of his employment as the Sheriff of Los Angeles County. As Sheriff, he is the chief executive officer of the Los Angeles Sheriff Department. According to California law, the Sheriff is answerable for the safekeeping of the inmates in his custody. California Government Code §§26605 and 26610; California Penal Code §4006. Specifically, Defendant BACA is responsible for the oversight, management and administration of policies of the County of Los Angeles with reference to local jails, including but not limited to housing practices, transportation, and, medical and dental services. This includes all matters relating to the selection, supervision, promotion, training, and discipline of the uniformed staff, including the supervisory security and medical staffs, of the County Jails. He is also responsible for the care, custody, and control of all inmates housed in the County Jails.

95. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, and, MICHAEL D. ANTONOVICH are members of the Board of Supervisors of Los Angeles County. The Board of Supervisors is the governing body of the County of Los Angeles, a charter county. As such, it has the function of serving as the executive and legislative head of the Los Angeles County.

96. DEFENDANTS GLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, AND, MICHAEL D. ANTONOVICH are also responsible

1 for the oversight of The Sybil Brand Commission for institutional inspections consists of ten  
2 commissioners, who were appointed by the Los Angeles County Board of Supervisors (two from  
3 each Supervisorial District). The Sybil Brand Commissioners conducts inspections of jails,  
4 lockups, probation and correctional facilities in the Los Angeles County at least once each year.  
5 They may conduct additional inspections more often as the Commission may deem necessary or  
6 as directed by a judge of the Superior Court. These inspections involve a complete evaluation of  
7 the condition of each facility the members of the Commission or a committee of the  
8 Commission. These inspections are to involve a complete evaluation of the condition of each  
9 facility's effective and economical administration, cleanliness, discipline and comfort of its  
10 inmates.  
11

12  
13 97. At all times mentioned herein, DEFENDANTS LEROY BACA, GLORIA  
14 MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE, MICHAEL D.  
15 ANTONOVICH, and, LOS ANGELES COUNTY knew or should have known that the  
16 conditions of the Century Regional Detention Facility were ineffective, unclean and subjected  
17 inmates to the risk of harm and even the risk of death. Defendants and each of them failed in the  
18 oversight, management and administration of the County of Los Angeles with reference to local  
19 jails, including but not limited to housing practices, transportation, and, medical and dental  
20 services. Furthermore, Defendants and each of them, knew or should have known that Los  
21 Angeles County employees that caused harm to Plaintiff were unfit to perform the work for  
22 which they were hired and that this unfitness created a particular risk of harm to Plaintiff and the  
23 public at large.  
24

25  
26 98. Defendants have failed to conduct meaningful investigations of reports of excessive  
27 force, improper strip searches, sub-standard medical and dental care, render guilty deputies  
28

1 accountable, and repeatedly ignored evidence that deputies and other Los Angeles County  
2 officials are covering up incidents of excessive force, inmate torture, substandard medical care,  
3 improper strip searches and overall prisoner abuse.

4 99. As a direct and proximate cause of the evident unfitness of the employees,  
5 administrators and officials of DEFENDANT LOS ANGELES COUNTY and DEFENDANT  
6 LOS ANGELES COUNTY, LEROY BACA, FLORIA MOLINA, MARK RIDLEY-THOMAS,  
7 ZEV YAROSLAVSKY, DON KNABE AND MICHAEL D. ANTONOVICH'S negligence in  
8 hiring, retaining and failing to properly supervise its administrators, employees and the  
9 conditions of the Century Regional Detention Facility, Plaintiff has been generally and specially  
10 damaged in an amount to be established at trial.  
11  
12

13  
14 **ELEVENTH CLAIM FOR**  
15 **NEGLIGENCE**  
16 **(AGAINST DEFENDANTS LEROY BACA, GLORIA MOLINA, MARK RIDLEY-**  
17 **THOMAS, ZEV YAROSLAVSKY, DON KNABE, MICHAEL D. ANTONOVICH, AND,**  
18 **LOS ANGELES COUNTY)**

19 100. Plaintiff incorporates herein by reference paragraphs 1 through 99 as though fully  
20 set forth below.

21 101. Defendants, and each of them, have an obligation to oversee and evaluate the  
22 condition of each Los Angeles County jail facility's effective and economical administration,  
23 cleanliness, discipline and comfort of its inmate. This includes housing practices, transportation,  
24 and, medical and dental services. This also includes all matters relating to the selection,  
25 supervision, promotion, training, and discipline of the uniformed staff, including the supervisory  
26 security and medical staffs, of the County Jails. Defendants, and each of them, are also  
27 responsible for the care, custody, and control of all inmates housed in the County Jails.  
28

1           102. Defendants have failed in their obligations to provide adequate medical and dental  
2 care, clean facilities, as well as effective and economical administration of its facilities.

3 Defendants have further failed to conduct meaningful investigations of reports of excessive  
4 force, improper strip searches, sub-standard medical and dental care, render guilty deputies  
5 accountable, and, have repeatedly ignored evidence that deputies and other Los Angeles County  
6 officials are covering up incidents of excessive force, inmate torture, substandard medical care,  
7 improper strip searches and overall prisoner abuse.  
8

9           103. On November 15, 2011, a medical order was issued by the Los Angeles Superior  
10 Court ordering that Plaintiff's INR level be monitored while taking the medication Coumadin.  
11 That medical order was ignored by the medical staff and administrators of the Century Regional  
12 Detention Facility until November 30, 2011.  
13

14           104. On November 30, 2011, Plaintiff's INR level was taken and it was 4.4 which is  
15 twice the level that it should have been. Plaintiff was therefore subject to internal bleeding and  
16 other very serious medical conditions. On or about December 2, 2011, Plaintiff's medication  
17 was discontinued. Her INR was not taken again by the medical staff of the Century Regional  
18 Detention Facility.  
19

20           105. On numerous occasion during her incarceration, Plaintiff requested dental care for  
21 an infected tooth. At no time from November 15, 2011 to December 17, 2011, was Plaintiff  
22 examined by a dentist. Plaintiff ultimately lost her infected tooth.  
23

24           106. On December 17, 2011, Plaintiff's INR was 1.1 which was two times below that  
25 which it should have been, thereby subjecting her to blood clots in her legs and/or legs which  
26 could have caused her death.  
27  
28

107. As a direct and proximate cause of the failures of the employees, administrators and officials of DEFENDANT LOS ANGELES COUNTY and DEFENDANT LOS ANGELES COUNTY, LEROY BACA, FLORIA MOLINA, MARK RIDLEY-THOMAS, ZEV YAROSLAVSKY, DON KNABE AND MICHAEL D. ANTONOVICH'S in their obligations to provide adequate medical and dental care as well as effective and economical administration of its facilities, Plaintiff has been generally and specially damaged in an amount to be established at trial.

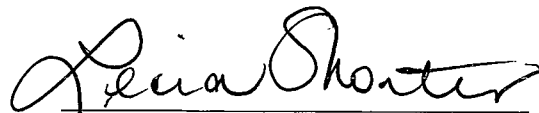
WHEREFORE Plaintiff prays for judgment against Defendants, jointly and severally, as follows:

1. For general damages in the amount of \$1.25 million;
2. For general damages for mental and emotional distress according to proof;
3. For punitive damages;
4. For a civil penalty for each unlawful violation;
5. For costs of suit incurred herein;
6. Reasonable attorney's fees as allowed by statute; and,
7. For such other and further relief as the court may deem proper.

**DEMAND FOR JURY TRIAL**

Plaintiff LECIA L. SHORTER hereby demands a jury trial.

Dated: January 20, 2014



LECIA L. SHORTER  
PLAINTIFF IN PRO PER

DECLARATION OF LECIA L. SHORTER

I, Lecia L. Shorter, do hereby declare:

1. I am the plaintiff in this action.
2. I declare that the facts set forth herein are true and of my own personal knowledge except as to those matters which are stated on information and belief.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

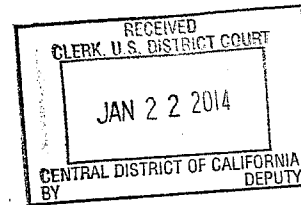
Dated: January 20, 2014

  
LECIA L. SHORTER



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Lena Short  
287 S. Robertson Blvd  
No. 291  
Beverly Hills, CA 90211



AGP

United States District Court  
Central District  
312 N. Spring Street  
Los Angeles, CA 90012

ATTN: CIVIL FILING CLERK